

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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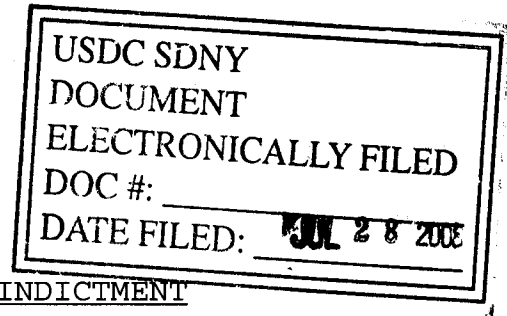
UNITED STATES OF AMERICA :

- v. - :

WYNNE JOYNER, :

Defendant.

INDICTMENT



08 CRIM 696

- - - - - x

COUNT ONE

Conspiracy to Commit Mail Fraud

The Grand Jury charges:

1. From at least in or about February 2004 through at least in or about August 2004, in the Southern District of New York and elsewhere, WYNNE JOYNER, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree, together and with each other, to commit an offense under Chapter 63 of Title 18, United States Code.

2. It was a part and object of said conspiracy that WYNNE JOYNER, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, to wit, a scheme to defraud the United States Department of Housing and Urban Development by seeking reimbursement for expenses that had not

been incurred, for the purpose of executing such scheme and artifice and attempting to do so, would and did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and would and did deposit and cause to be deposited a matter and thing to be sent and delivered by a private and commercial interstate carrier, and would and did take and receive therefrom a matter and thing, and knowingly would and did cause to be delivered by mail and such carrier according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is addressed, such matter and thing, in violation of Title 18, United States Code, Section 1341.

Overt Acts

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 24, 2004, WYNEE JOYNER, the defendant, caused an employee of National Housing Group, Inc. ("NHG") to mail a request to the Department of Housing and Urban Development, seeking reimbursement for expenses that NHG had not, in fact, incurred.

b. On or about June 23, 2004, JOYNER sent an e-mail message to the Department of Housing and Urban Development.

c. On or about August 16, 2004, JOYNER caused an employee of NHG to send a check by United States mail to a company located in the Bronx, New York.

(Title 18, United States Code, Section 1349.)

COUNT TWO

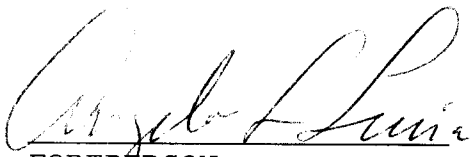
Mail Fraud

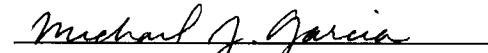
The Grand Jury further charges:

4. From at least in or about February 2004 through at least in or about August 2004, in the Southern District of New York and elsewhere, WYNEE JOYNER, the defendant, unlawfully, willfully, and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice, did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and did deposit and cause to be deposited a matter and thing to be sent and delivered by a private and commercial interstate carrier, and did take and receive therefrom a matter and thing, and knowingly did cause to be delivered by mail and such carrier according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is addressed such matter and thing, to

wit, in furtherance of a scheme to defraud the United States Department of Housing and Urban Development ("HUD"), JOYNER caused her company - National Housing Group, Inc. ("NHG") - to submit fraudulent reimbursement requests to HUD for payments to third-party vendors that NHG had, in fact, withheld from those vendors, and caused NHG to mail payment checks to the vendors only after the purported "reimbursement" was received, if at all.

(Title 18, United States Code, Sections 1341 and 2.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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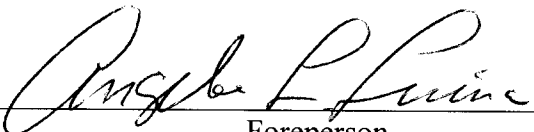
INDICTMENT

08 Cr.

(Title 18, United States Code,
Sections 1341, 1349, and 2)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

7/28/08 FILED INDICTMENT. CASE ASSIGNED TO
JUDGE STEIN
ELLIS M.J.